

Patti Fox  
Arbonne International

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Dear Sir or Madam,

I write to inform you that I am concerned about the proposed Business Opportunity Rule R511993. I believe that in its present form, it could prevent me from continuing as an Arbonne Independent Consultant. I understand and appreciate that part of the FTC's responsibility is to protect the public from "unfair and deceptive acts or practices," but some areas of the proposed rule will make it very difficult, if not impossible, for me to sell Arbonne products and sponsor people into the business.

One of the most potentially damaging, confusing and restrictive sections of the proposed rule is the 7-day waiting period to sign up new Consultants. Not only do Arbonne Starter Kits cost a nominal amount of money, but also, the Arbonne business plan is clearly articulated in the Policies and Procedures. The integrity of this company would come unduly into question under the proposed waiting period as it gives the impression that there might be something wrong with the Arbonne opportunity. Under this waiting period requirement, I will need to keep very detailed records when I first speak to someone about Arbonne and keep track of when to follow up. One of the key elements to my success in this business has been capturing the natural reaction to the immediate results that prospects experience with the Arbonne products; the waiting period would potentially limit my ability to grow my business.

The proposed rule also calls for the release of **any** information regarding lawsuits involving misrepresentation, or unfair or deceptive practices. It does not matter if the company was found innocent. A lawsuit may incorrectly imply wrongdoing and it seems unfair to disclose lawsuit information unless Arbonne has been found guilty of something. I fear being penalized by the impression a lawsuit would leave, especially if I have done nothing wrong.

Finally, the proposed rule requires the disclosure of a minimum of 10 prior Independent consultants nearest to the prospective Consultant. I am glad to provide references, but the reality of identity theft in today's world makes me very uncomfortable with the suggestion of giving out any individual's personal information without their permission or knowledge. The proposed rule includes the language, "If you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers". Prospects will be understandably concerned about their privacy. I would find it an invasion of privacy to disclose personal data for my business purposes. Also, sharing this information could damage the business relationships of references with those involved in other companies or businesses, as well as, providing an unfair advantage to competitors. In order to get the proposed list of 10 prior Independent consultants, I would need to send the address of a prospect to the Arbonne corporate office in California and then wait for the list.

I have been an Arbonne Independent Consultant for more than one year. I became a Consultant because I love the products and believe in providing my family with pure, safe and beneficial products as an alternative to those products commonly found in the marketplace. I am also able to provide our family with a much-needed secondary source of potential income. Since starting my Arbonne business, I have developed a team of over 300 Independent Consultants across the country and together we are helping our families enjoy better lives. I have never experienced an industry or a company that allows everybody who is willing to work, the same opportunity to succeed and go to the top of the company.

I truly appreciate the work of the FTC in protecting consumers, and in turn, my own business, but I believe this proposed new rule would have many detrimental (and unintentional) consequences. I'm confident there are alternative means to resolving the outstanding issues at hand without harming the livelihood of millions of successful network marketers like me.

Thank you for your time and understanding.

Sincerely,

Patti Fox